

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA **FILED**

Kidney Dialysis & Transplant Group PLLC



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DEC 29 2015

U.S. DISTRICT COURT-WVND  
CLARKSBURG, WV 26301

Exhibit- Plaintiffs & Defendants List

\*

(Full name and address of the plaintiff)

**Plaintiff(s)**

vs.



\*

Sunshine Day Care Academy

Civil No.: 1:15cv239

(Leave blank. To be filled in by Court.)

Pitrolo & Associates, PLLC

\*

Maged Gouda

Clair Fahmy

\*

Exhibit-Plaintiffs & Defendants List

(Full name and address of the defendant(s))

**Defendant(s)**

\*

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**COMPLAINT**

1. Jurisdiction in this case is based on:

- Diversity (none of the defendants are residents of the state where plaintiff is a resident)
- Federal question (suit is based upon a federal statute or provision of the United States Constitution
- Other (explain)

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2. The facts of this case are: 

1) Maged Gouda (MAGED) & his wife who are residents of South Carolina came to West Virginia.

demolished the professional interior structure of the commercial building located at 168

Thompson Drive, Bridgeport WV 26330. They Did that without the authorization of the

founder, owner, and president of MedStar Real Estate and Development LLC, Plaintiff Nabil

Guirguis. They did it against his will in duress. They did it while exerting threats of destroying

his professional career. They did it to advance their own personal agenda of establishing

franchised daycare business in West Virginia, South Carolina, and New Jersey, where the

members of the Gouda Family live. The financial damages are around \$250,000.00. Date of the

incident is Jan 1st 2014. MAGED works as a full time security guard at MUSC Public

2) Clair Fahmay a resident of West Virginia is believed to suffer from grandiose/malignant

Narcissistic Personality Disorder with criminal mind-CrimeLitigCivil 000186. She controlled and

organized the members of the Gouda family to conduct many unlawful acts item 1 and the

other items below.

3) Amal controlled by Clair Gouda forged the signature of the Plaintiff Nabil

Guirguis and bought one million dollar life policy designating herself as the ONLY beneficiary.

Her unlawful act was discovered on April 2015 during discovery procedure of civil litigation.

4) Amal Gouda, Clair Fahmy, and Momtaz Gouda (all members of the Gouda Family), opened

Joined secret account at Citi Bank where the daughter Amal Gouda embezzled and laundered

tens of thousands of dollars (over years = hundreds of thousands of dollars from the businesses

of Plaintiff Nabil Guirguis. This money is believed to be laundered to SC and NJ. Maged Gouda

acquired 7 houses and Rhonda Gouda acquired a house when they had no means. Cont. Page5

3. The relief I want the court to order is: 



Damages in the amount of: 5-7 million dollars 



An injunction ordering: Injunction Relief to Stop Breach of Settlement Agreement between 

Plaintiffs and Defendants Amal Gouda Guirguis, Amy Lanham, Shannon Thomas and others.



Other (explain) Addendum 

12/22/2015

(Date)

12 | 29 | 15  
Nabil Guirguis





(Signature)

Nabil Guirguis

PO Box 1754

Beckley, WV 25802

Cell: 304-629-6614; Fax: 888-508-2898

(Printed name, address and phone number of Plaintiff)

### Privacy Rules and Judicial Conference Privacy Policy

Under the E-Government Act and Judicial Conference policy, any paper filed with the court should not contain an individual's social security number, full birth date, or home address; the full name of person known to be a minor; or a complete financial account number. These rules address the privacy concerns resulting from public access to electronic case files.

**PLAINTIFFS (P):**

**EXHIBIT- PLAINTIFFS & DEFENDANTS LIST- ~~CONFIDENTIAL UNDER SEAL~~**

1. Kidney Dialysis and Transplant Group PLLC, 2. Kidney Dialysis and Transplant Group Inc.
3. Nabil Guirguis MD, 4. Serena Guirguis, 5. Verina Guirguis, 6. Christina Guirguis, 7. MedStar Real Estate and Development LLC, 8. Gentle Dialysis Center

Mail Address: PO BOX 1754 Beckley WV 25802, Business Address: 166 Thompson Dr Bridgeport, WV 26330

**DEFENDANTS (D):**

1. Maged Gouda-will be referred to him as MAGED, -Contact info: Security Guard; Safety Department 171 Ashley Ave, Charleston, SC 29425, Tel: 843-792-4149. Cell: 843-343-1265
2. Momtaz Gouda- Will be referred to him as GOUDA- he is the husband of Clair Fahmy (CLAIR), and the father of MAGED, AMAL, and RHONDA.
3. Clair Fahmy- she is the wife of GOUDA, and the mother of MAGED, AMAL, and RHONDA. she dwell with her husband GOUDA, Contact info: the subsidized welfare house called Mason House, Aprt# 202, 130 Washington Avenue Clarksburg, WV 26301, Tel: 304-622-2721
4. Rhonda Malak- the daughter of CLAIR and GOUDA and will be referred to as RHONDA
5. Emad Malak- the husband of Rhonda Malak and will be referred to as EMAD, Contact info: 19 Hillside Ave, Oakland, NJ 07436-1907, Tel: 201-644-0357; cell: 201-779-4487; cell: 551-221-4556
6. Amal Gouda Guirguis- the Ex-wife of Nabil Guirguis and will be referred to her as AMAL, Contact info: 168 Thompson Dr. Bridgeport, WV 26330, Tel: 304-842-7777
- 7. Sunshine Day Care Academy, Contact info: 168 Thompson Dr. Bridgeport, WV 26330, Tel: 304-842-7777**
- 8. BrickStreet Insurance or any other worker's compensation of Sunshine Day Care Academy, Contact info: 400 D**
- 9. Scottsdale Insurance CO, commercial insurance of Sunshine Daycare Academy, Contact Info: PO BOX 7878 Huntington, WV 25778 Tel: 800-624-3422**
10. Joseph Pirolo, Tax Preparatory; 309 Cleveland Ave., Suite 512 Fairmont WV, 26554
11. Pirolo & Associates, PLLC, 309 Cleveland Ave., Suite 512 Fairmont WV, 26554 Phone: 304-367-8908, Fax: 304-367-8909
12. Pirolo & Associates, Professional Insurance
13. Pirolo & Associates, Business Insurance
14. Principle Hoffman, business located at Bridgeport, WV
15. Johnson Elementary School, Bridgeport, WV
16. Amy Lanham, 230 Court St. Clarksburg, WV 26301; (304) 623-9711
17. Shannon Thomas, business located at 456 Center Ave, Weston, WV
18. Tammy Hamner, business located at 917 W Main Street, Bridgeport, WV
19. John Walker, Chief of Bridgeport Police West Virginia
20. Terry Walker, Director of local Clarksburg Child Protective Service

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21. James Keenan

22. Sherrill Powell, and employee of Sunshine Daycare Academy

  12/30/15

23. Lori B. Jackson on her personal capacity (PD)

24. John Lanham (PD)

25. James and Jones

Plaintiffs and Defendants will be referred to them by their assigned number to protect the confidentiality of everyone involved given that the case is high profile and involves many professional individuals who are private and holds public offices. For example, Defendant Maged Gouda will be referred to him as D1 and Plaintiff Nabil Guirguis MD, P3.

This is a very complex and intertwining complaint that deals with many complaints against professionals and public figures and importantly it also deals with the privacy of infant children and health records of many professional individuals. It seems appropriate to de-identify the complaint and place their identity in this record until more evidence are found and then public right to know except for the children could be enforced if requested.

Wherefore,

Plaintiff, Pro Se, request that this document is protected and confidential and placed under seal.

Respectfully yours,

X

DocuSigned by:  
Nabil Guirguis  
1A547467A9EF4E4...

Nabil Guirguis  
CEO

12/28/2015

*No Page (4)*  
*new*  
*12/29/15*

Addendum to the Federal complaint:

#### COMPLAINT- Page-5

The Gouda Family includes Clair Fahmy and Momtaz Gouda who are the parents of Maged Gouda, Rhonda Malak, and Amal Gouda Guirguis. Clair Fahmy suffers from malignant grandiose Narcissistic Personality Disorder that gave her criminal mind and ability to totally control her kids to commit crimes against the Guirguis' family and the poor in West Virginia. They committed welfare fraud and ripped the system off by hundreds of thousands of dollars. They also ripped the Guirguis' businesses by committing embezzlement, money laundry, theft by deception, perjury, identity theft, false pretense, vandalizing businesses, defamation of character of Dr. Guirguis, and shutting down his businesses to replace them with franchised daycare business in WV, SC, and NJ. They controlled the adults of the Guirguis' family, exploited them and abused them to induce severe stress at Guirguis' family and push it to premeditated malicious divorce associated with destruction of businesses and defamation of character. The names will be replaced by the assigned numerical value from the List of Plaintiffs and Defendants following the initial letter P or D for Plaintiff or Defendant subsequently.

The evidence and believes presented here and formed the base of the claims were uncovered in and around March 2015 during the discovery of the civil procedures at the Family Court of Harrison County.

The case will be presented by referring to evidence (Exhibits) followed by explanation:

1. Crime-Civil-Litigation 000003: The counsel of P3 to D16 the counsel of D6, "Please note that QuickBooks software and the electronic information there belongs to Dr. Guirguis and he is legally entitled to them. Your client's denying access to his properties is illegal.;" "The three months picked up by your client clearly show that she makes much more than minimum wage. Your client's delay in producing this information demonstrates the false financial statement she filed with the Court.;" "please be advised that Ms. Guirguis should not open Dr. Guirguis mail. Please, have your client forward the mail to Dr. Guirguis.". D6 and the Gouda family stole the Computer Server of the businesses of P3 to prevent him from restarting his businesses. The computer contains demographic and identity information of about 3,000 patients. It also contains the health records of these patients, which is HIPPA violation. It contains all the financial information of all the businesses of P3. D6 disregarded the court orders for over one year, and was found to be on contempt, however in sanction, she was ordered by D19 to just provide an affidavit to say that she D6 did not have it. D6 concealed critical financial information to hide hundreds of thousands of dollars that she and her family embezzlement.
2. Crime-Civil-Litigation 000005: Chase Bank reported that D6 attempted to open a business account for MedStar Real Estate and Development LLC, which is operated and 90% owned by Dr. Guirguis. This is a false pretense because D6 had no control at all according to the Operating Agreement- Crime-Civil-Litigation 000030.
3. Crime-Civil-Litigation 000014: on Nov 18<sup>th</sup> 2015, it was discovered that D6 had shut down all businesses of P3. This could have been done electronically by cyberspace and invading the electronic cabinet of P3 at the Secretary of State website. Or, she falsified, forged, or false pretense the identity of P3 to shut down the companies using state forms. The discovery is reported to the legal department at the SOS and the result of investigation is pending. The healthcare businesses when they were shut down were profitable. For example, Gentle Dialysis Center was in the middle of sale with a good offer on table, Crime-Civil-Litigation 000159.... \$1.8M.
4. Crime-Civil-Litigation 000018: Notice and Deadline from P3 as the owner and operator of the healthcare businesses (Kidney Dialysis and Transplant Group PLLC, Kidney Dialysis and Transplant Group Inc., Gentle Dialysis Center, Hemodialysis and Ultrafiltration Company LLC, and MedStar Real Estate and Development LLC) to D6 who was the financial controller of these companies but was fired by in and around 2013 because of evidence of embezzlement and tax frauds.

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**COMPLAINT- PAGE 6**

5. Crime-Civil-Litigation 000022: Tenant of 168 Thompson Drive, Bridgeport WV 26330. Summit Engineering will provide the floor plan of the building before it was demolished by D1, D6 and the Gouda Family.
6. Crime-Civil-Litigation 000024: Lease agreement between MedStar Real Estate and Sunshine Day Care Academy LLC. Two members companies between D6 and D4 (50%:50%). Sunshine Day Care is seriously delinquent in paying the lease, amount due is:  
.....\$142,000.00
7. Crime-Civil-Litigation 000044: Operating Agreement of Gentle Dialysis Center. It was shut down by D6 and Gouda Family. D6 was an employee receiving a wage and did not have any control. It was shut down by D6 and Gouda Family. D6 was an employee receiving a wage and did not have any control.
8. Crime-Civil-Litigation 000072: Follow up letter to the Harrison County Prosecuting Attorney to follow up with her instruction to accept the claims of P3 against D6 and her family, ONLY if they were supported by evidence. The letter also notified the Prosecuting attorney of harassments by D20.
9. Crime-Civil-Litigation 000074: Identity Theft Victims Complaint and Affidavit signed by the Bridgeport Police after filing the criminal reports.
10. Crime-Civil-Litigation 000086: D6 tampered the entry door of 166 Thompson Dr building that hosts the businesses of P3 in malice to prevent him from restarting his business after she and her family shut them down.
11. Crime-Civil-Litigation 000088: Police Report of embezzlement and misappropriation of funds of hundreds of thousands.  
.....hundreds of thousands of dollars.  
D1 the brother who works as a security officer full time at Charleston South Carolina acquired 7 houses in the last few years even though he has been struggling financially. Although D6 and D10 obstructed the discovery and concealed critical financial evidence, request of information of City National Bank uncovered a secret joined account of D6, D3, and D2 (Crime-Civil-Litigation Crime-Civil-Litigation 000118, check out of \$1,800.00 written by D2).
12. Crime-Civil-Litigation 000089: Police Report of identity theft and false pretense in Mon Power  
..... \$1070.04
13. Crime-Civil-Litigation 000090: Police Report of stolen computer server, other devices and machines that belong to the businesses of D3.
14. Crime-Civil-Litigation 000091 & Crime-Civil-Litigation 000142: Police Report, forged signature and identity theft, and forged signature to obtain a life insurance of one million dollars in 2005 with Transamerica life insurance with a face value of \$68,000.00.
15. Crime-Civil-Litigation 000095: Evidence from QuickBooks Inc. Payroll department that shows that D6 has committed identity theft and false pretense and charged credit card of Kidney Dialysis and Transplant Group PLLC, the business of P3, to pay for the QuickBooks payroll subscription for Sunshine Day Care Academy. The payroll file ID, exhibit Crime-Civil-Litigation 000099, ties D6 to the QuickBooks of the businesses of P3 and his computer server.
16. Crime-Civil-Litigation 000148: D6 identified P3 as her primary care physician when she went to medial facilities like UHC on 02/25/2015.
17. Crime-Civil-Litigation 000149: malicious prosecution case. D7, D8, D9, D6, D3, D16, D19 and others awaiting investigation, maliciously violated the constitutional and civil laws and incarcerated P3 for three nights in absence of any wrongdoings and when P3 has been in the Court House. D6 and her family did it to prevent P3 from restarting his businesses at 166 Thompson Drive to use the building to expand her current daycare business. D16 threatened P3 with jail time if he did not give in and subject himself to more psych evolution just because she did not like the psych evaluation that P3 already completed as ordered by the court. D19 openly threatened P3 of putting him on jail. This happened when P3 objected the obstruction of the law enforcement by D19 and his wife D20 when the law enforcement officers were serving D6 with a DVP related to the injuries P4 sustained related to abuse and neglect. The jail caused severe public defamation of Dr. Guirguis. D7, D8, and D9 are included as defendant because of the involvement of an employee of sunshine day care academy and the presence of business dispute that caused the shutdown of the businesses of Dr. Guirguis and the ongoing attempts to prevent him from restarting his businesses.

**DEFAMATION OF CHARACTERS**

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**COMPLAINT- PAGE 7**

As part time, P3 was making in average around \$7,000 per month. The malicious intervention of D6 to prevent P3 from conducting his remaining business caused a net loss of ..... **\$112,000.00**

18. Crime-Civil-Litigation 000161: D16 made intense demand of attending and completing the psych evaluation of P3 by saying, "The burning issue at this time is Dr. Guirguis' medical records".

19. Crime-Civil-Litigation 000164: 12-05-2015, Order Pendenteelite, standard visitation, no claim by the petitioner that P3 had any psych issues affecting the parenting of the infant children.

20. Crime-Civil-Litigation 000171 & Crime-Civil-Litigation 000175: evidence that the psych evaluation was complete according to the court order and in compliance of the Petitioner and her Counsel's plan.

21. Crime-Civil-Litigation 000209: independent psychological evaluation

22. Crime-Civil-Litigation 000223: The court accepted and ordered the telephonic appearance of the psych evaluation on March 30<sup>th</sup> 2015 with no objection from D6, D16, D17, which is an admission by them that the psych evaluation was accepted by them. Crime-Civil-Litigation 000279, Order PD23 permitting telephonic testimony of the Psychiatrist, whom she claimed along with D6, D16, and D17 that he was selected by P3. Their actions do not reconcile and indicates their malice in their attempts to violate the constitutional law and rights of P3 of subjecting him to more psych evaluation.

23. Crime-Civil-Litigation 000237: Workers Compensation covered by Brickstreet Insurance. D20 an employee of Sunshine Daycare academy involved wrongdoing to advance the business of Sunshine. Brickstreet Insurance failed in its duty to make sure that the owner and management of Sunshine does not adopt policies that incite negative business marketing strategies. Note that D4 and D6 signed the application as co-managers and co-owners.

24. Crime-Civil-Litigation 000239: Brickstreet Insurance failed in its duty to verify that question 7 was wrong because the entire sunshine daycare was done was unlicensed individuals with no insurance coverage. It also failed in its duty to make sure that no employees were hired at age less than 18 years-old. Sunshine hired infant children to labor in its facility and enrolled them in the payroll. Sunshine was sighted by the state surveyor for having P4, P5, and P6 labor in cleaning the facility and had P5 and P6 work as teachers. P4, P5, and P6 are the children of P3 and subjecting them to such environment is clearly unlawful because its known adverse impact on the children and their future.

25. Crime-Civil-Litigation 000247: Scottsdale Insurance CO, commercial insurance of Sunshine Daycare Academy failed in its duty to enforce safety program and prevent adverse marketing policies by the owners and managers of Sunshine Daycare academy. D4 and D6 involved in adverse actions against the healthcare businesses of P3 to advance its daycare business. Scottsdale failed in its duty to make sure that D4, D5, and D5 the children of P3 were not exposed to flammables and explosives when it issued and continue to issue commercial insurance without verifying that these critical conditions are met. The Daycare was established on the demolition of 168 Thompson drive building that is owned by MedStar an LLC company that was owned 90% and operated by P3. The demolition of the walls, the electric circuit, the gas lines, and the high power lines were done by D1 and the Gouda family. They were not licensed or insured. They conducted the business without a city permit. Absence of city permit should have been an easy clue for Scottsdale to make demands of fixing the underline risks before offering the insurance. Its failure allowed Sunshine to labor the children and subject them to serious work related risks. Failure in its duty to enforce the law related to negligent hiring when Sunshine received multiple state notices related to not doing criminal background check before hiring, hiring underage, hiring unqualified individuals and subject P4, P5, P6 and MedStar to risks and liabilities. The failure is evident because negligent hiring was evident when two cases of child abuse and neglect were surfaced in the local news by recorded eyewitness who recorded the two incidents by camera. Its failure to make sure that the fire code is according to the standard of safety for a daycare facility that has a kitchen and trapped children including the children of P3.

26. Crime-Civil-Litigation 000253: failed in its duty because sunshine was built on unauthorized invasion of 168 Thompson Dr building that is owned and operated by P3. The demolition of the building caused internal structural damages of ..... **\$250,000.00**

27. Crime-Civil-Litigation 000313: Affidavit of a neighbor who has been in close relationship with the family for 8 years. Observation of negligence by D6 of her infant children.

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**COMPLAINT- PAGE 8**

28. Crime-Civil-Litigation 000319: The professional opinion of an Associate of Developmental psychology (PhD in psychology) after she observed P4 for 8 hours continuously. Observation of lack of love of a mother. D4 is asking for another mother.
29. Crime-Civil-Litigation 000321: Adult Protective Service complaint submitted against D3 and D6 related to underline Narcissistic Personality disorder with malignant degree in D3 and less severe degree by D6. D3 abused D6, and both of them abused the adult children of the Guirguis' family.
30. Crime-Civil-Litigation 000326: P3 has been the primary care physician of D3 for over 10 years. D6, D16, D17, P3 and her counsel, and the mediator all agreed without any objection to, "The children will not be left alone with their maternal grandchildren".
31. Crime-Civil-Litigation 000326, item 1, "Each party shall complete a psychiatric evaluation with a Comprehensive psychological component to include collateral interviews and review of any written documentation (i.e. medical records) requested by the evaluator, to be contacted within seven (7) days, to be completed by a psychiatrist who practices outside of Harrison County and recommended by Tammy Hamner." D6, D16, D17, D18, and PD23 violated the initial court order of March 30<sup>th</sup> 2015 that accepted the telephonic testimony of the Psychiatrist whom P3 has been seeing. They did not like the final reports. They coerced P3 during mediation by putting him between a hard place (neglecting and abusing the baby P4 after her injury and refusing to subject D6 to any psych evaluation even though the underline D6's psychiatric condition causes severe distraction and the root cause of the safety gap for the children and the injury of P4), and hard place to undergo more psychiatric evaluation bearing its financial burden when P3 was suffering financially and in debit. D21 pointed out the violation of the constitutional law and rights of P3. This was met by retaliatory threat by D16, D17, and PD23 to subject D21 to sanctions for Civil Rule 11 violation. Their action caused D21 to become very ill from stress and he abandoned his client P3 for weeks before a very important hearing, 09/21/2015 and the sad outcome of throwing P3 under the bus to save his skin from the mad of the women D16, D17, and PD23- Exhibit, Crime-Civil-Litigation 000354.
32. Because PD23 created clear trend of 100% favoring D6, D16, and D17 even in absence of any evidence and even in presence of merely, "she said" (hearsay level). PD23 took 100% adverse decision against the civil, constitutional, and human rights of the male P3. PD23 admitted in hearing (video recorded) that there were no constitutional rights, civil rights or legal rights in her court. P3 charged the women of creating a radical feminist targeting men with hate. She stepped out of her authority and did many unethical conducts. An official complaint to the Judiciary Disciplinary board is pending.
33. Crime-Civil-Litigation 000329 & Crime-Civil-Litigation 000331: Peer Review article, "refining the construct of Narcissistic Personality Disorder: Diagnostic Criteria and Subtypes."
34. Crime-Civil-Litigation 000338- Crime-Civil-Litigation 000347, Mr. Bob Miller selected by D16, D17, and PD23 refused to disclose any conflict of interest.
35. 31. Crime-Civil-Litigation 000326 - Crime-Civil-Litigation 000384: unethical and unlawful discrimination action by radical feminist women D6, D16, D17, PD23, D14, D18, D20, with the support of their beneficiaries and husbands D19 and PD24, against P3 because of his male gender (specially he demonstrates patriotic characters like Lt. Kirk in the famous case against PD23, "child Abuse from the Bench" and how children are used as tools of torturing the patriotic men because the very nature they have of being loving and loyal to their families, children and countries and that lead them to take dangerous positions that other men avoid like working for the military force, border protection, hardship jobs like coalmining, etc.). P3 is a son of air force veteran and he served in military before and has been serving our veterans in a federal government job. He certainly demonstrates patriotic characters with a lot of love to his family, children and our country.
36. Crime-Civil-Litigation 000385 - Crime-Civil-Litigation 000408: The Forensic Accountant of P3 discovered that D10, D11, D12, and D13 has been conspiring with D6 and her family to establish secret accounts to conduct unlawful actions against the welfare, IRS, and the businesses of P3. He was conducting his unlawful actions in secret behind the back of the owner and operator of the healthcare businesses of P3. He committed malpractice. He concealed critical evidence during court procedure. He lied during court procedure when he responded to subpoena by providing two blank CDs (perjury). He acted in malice to advance his own profit.
37. Crime-Civil-Litigation 000417 is a summary of the link between D16 who received large check from D6 before D6 malicious DVP, and PD24 who is her husband and working as an assistant producing attorney in Harrison County.

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**COMPLAINT- PAGE 9**

38. Crime-Civil-Litigation 000418- Crime-Civil-Litigation 000452: evidence that link D16, 17, 18, 18, 19, 20, PD23, and D24 who are private professional and public officials and who engaged in public corruption to advance their elite status, advance their financial gain, control and power within the community by discriminating against P3 as a man and because of his accent and national origin. They took malicious actions that undermined the constitutional, legal, civil, and human rights of him, his businesses, his children, and his family.
39. Crime-Civil-Litigation 000453: a peer review article that explains the medical bases of the adult abuse of D3 and the Gouda family of the adults of the Guirguis family.
40. Crime-Civil-Litigation 000468 - Crime-Civil-Litigation 000478: the mental illness of D17 and that led to grandiosity, paranoid, loss of insight, poor decision making capacity and crossing the line of legality to abuse P3, his family and their wealth and to advance her hate agenda towards men especially those who carry the patriotic characters like military personnel and those who serve them.
41. Crime-Civil-Litigation 000479- Crime-Civil-Litigation 000486: D6 is suffering from Histrionic Narcissistic Personality Disorder, totally controlled by D3 who suffers from malignant/grandiose Narcissistic Personality Disorder, major features of the disease is uncontrolled egocentric thinking and actions that lead to intense preoccupation of the brain that results in severe distraction and safety gaps for the children. This is the medical root cause of the adult and children abuse and neglect of the Guirguis Family by the Gouda family. In the following forms: maliciously manipulating the two adult children and turning them against the father P3 to the point of creating very hostile environment at home. The adult children and the P3 had the medical condition presented by the article- Crime-Civil-Litigation 000453, that made them vulnerable to be provoked by the lies and manipulations of D3 and D6 causing very hostile environment. D3, D6, the rest of their family and with the help of D12, and others, shut down the healthcare businesses with immediate loss of over 2 million dollars, stealing all cash, launder money across state lines to be sheltered in the form of real estate, D1 acquired 7 houses in South Carolina, money sheltered in joined accounts with children in NJ and SC (the grandchildren). D6 abandoned home, the kids, and businesses for 6 months between 2012 and 2013. She retained all business secret information to access payroll and business accounts. She dried out the accounts from cash. The collective sheer force caused acute brain injury that lead to acute stress disorder with severe anxiety. Loss of sleep and loss of memory. They took advantage of the situation and tried to label P3 with mental illness to use it in malice to cover up their crimes, take over his entire wealth, take over his commercial buildings, take over his shares in the houses, destroy him professionally, emotionally, psychologically, and eliminate him from the lives of his children. The labored him under threat and duress to work in the daycare against his will. They asked him to stepdown as a father and become totally passive and obedient to survive. They also demanded that he voluntarily stepdown as a physician and work under D6 in the day care. The amount of pain and suffering P3 endured through the total destruction were overwhelming seeing his beloved children falling as victims on the hands of the Gouda family who see them as resources to be exploited. The most vulnerable child of course the youngest child P4 because she did not have enough years to spend with the father and learn the Christian Orthodox Faith that discipline the individual to be of good characters, and responsible to all members of the family, the community and the country. She is also vulnerable because she looks exactly like her father P3 and similar to him in personality (her rejection of wrongdoing and being outspoken).
42. Crime-Civil-Litigation 000487- Crime-Civil-Litigation 000599: legal transcript of audio records of meetings with D17, D14, D16, provides clear evidence of conspiracy between the culprits to make P3 look "crazy" and used it to deny him his constitutional, civil, legal and human rights in malice to destroy P3 emotionally, psychologically, mentally, financially, professionally, and eliminate him from the entire market and the lives of the children in collaboration with D3 and D4. Other evidence of audio and video records of other culprits D19, and PD23 that also ties the law enforcement and the local judiciary system as culprits are available and will be made available for review during discovery.

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**COMPLAINT- PAGE 10**

Wherefore,

Plaintiffs pray for a trial by jury in the federal court to:

1. Order emergency injunction relief to prevent the breach of contract between Plaintiffs and defendant D6 and her family and D17 and that was executed and ordered by PD23 on Nov. 20<sup>th</sup> 2015. And, allow the custody case to move forward urgently to the circuit court. The GAL according to her testimony in the pretrial negotiation of a settlement agreement and during the trial that sending the case to the circuit court was in the best interest of the Plaintiffs to eliminate irreparable damages. In particular, the GAL also referred to the damages associated with alienating the father from the lives of the infant children for long time (the natural father-daughter relationship). The order will be limited to enforce the settlement agreement Only. The custody of the children will remain under the care of the State DHHR who made the appropriate recommendations to the family court and their efforts were met with compliance initially and then followed in two days with paranoia, mania and disregard by PD23, D17, D6, and D16. Not only that but resulted in retaliation and revenge against the father destroying his civil, constitutional, legal, and human rights under the federal laws. And throwing the children under the bus. PD23 in a state of paranoid and mania stated, I am sorry but if you did not agree to undergo more psych evaluation under this selected person, I can't help it and defend your children and started making very crazy orders against the welfare of the children like unleashing D3 who is known to have serious mental illness, and many other grave and unreasonable orders that can't be justified under any ethical standards even in the absence of any laws. Anyone would listen to the hearings of Nov 20<sup>th</sup> and 24<sup>th</sup> of 2015 can conclude that D17, and PD23 were not in a normal mental condition on Nov. 24<sup>th</sup> 2015. Of course that does not exclude D6 because she allowed her attorney D16 to join the forces against her own children. However, suffering from the same thing D3 is suffering from, the behavior does not come as a surprise (intense egocentric behavior).
2. Order Sunshine Daycare Academy, D1, D2, D3, D4, D5, D6, D8, D9, D10, D11, D12, and D13 to pay MedStar all seriously delinquent lease (money).
3. Order Sunshine Daycare Academy, D1, D2, D3, D4, D5, D6, D8, D9, D10, D11, D12, and D13 to pay the cost of professional renovation of the interior structure of 168 Thompson Drive to make it go back in market for lease.
4. Order the immediate eviction of Sunshine Daycare Academy because of the criminal nature of the director and her family and their malicious prosecution of the owner and the landlord. P3 can no longer feel safe going close to his offices when the defendants are abusing the law every time he goes to his office and effectively continue to shut down his business this way.
5. Order for Plaintiffs immediate financial relief from the federal and state funds as victims of crimes and vandalism.
6. Order defendants to pay P3 for serious damages of pain and sufferings.
7. Order defendants to pay Plaintiffs for damages related to defamation of characters of a physician in a good standing with national and international reputation, and all related losses of opportunities.
8. Order defendants to pay Plaintiffs for all defamation of characters related to forcing him to seek whistleblowing action to protect the welfare, the lives of his children and his.
9. Order defendants to pay for the pain and suffering of Plaintiffs P3, P4, and P5.
10. Order Defendants to pay for the child support until P3 recover his financial status and until the amount of child support is fairly determined by an expert.
11. Order the child support money to be placed in a joint account between the custodial parents and the use of court authorized two credit cards only for the sole purpose of spending and tracking the spending on the children to protect their money and allow them to build their financial assets and be able to pay for their high education and get through their education with minimal or no debt over their heads. P4, P5, P6 are extremely intelligent like their adult sisters and they have the same potential their sisters had.
12. Order defendants D1, D2, D3, D4, D5, and D6, to disclose all in state and out of state financial information of all their family members including the infant children.

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13. Order defendants D1, D2, D3, D4, D5, and D6, to disclose all in state and out of state financial information of all their family members including the infant children.
14. Order defendants D1, D2, D3, D4, D5, D6, to disclose all financial information in Egypt of all their family members including the infant children. P3 will make the necessary arrangements in Egypt to get the information through the appropriate channels once the court order is issued.
15. Order a search warrant to immediately recover the computer server to protect the private information of around three thousand patients and their medical records. Because of the local corruption, the family court refused to issue the search warrant although it was done before according to P3 counsel. Also, the local police and members of the prosecuting attorney office like PD24 refused to issue a search warrant or accept any request for that other than verbal request. It is preferred that the search is conducted by forces from the FBI in the presence of P3 to ensure the proper identification of the specific computer.
16. Order defendants D10, D11, D12, D13, D16, D17, PD23, D14, to produce all of their financial information and make it available to the forensic accountant to uncover the underline financial arrangements between the private professionals and those in public offices.
17. Order FBI investigation and their intervention to stop the ongoing public harassment and terrifying P3 and his children by the local law enforcement, school guards, judicial system and members of the prosecuting attorney. The ethics and conducts of the local judicial system is clearly malicious after PD23 admitted in the court records during hearing that there is no civil, constitutional, legal, or human rights in her court. And, in the presence of strong evidence of total disregard of the due process for Plaintiffs.
18. Order FBI involvement in any legal procedures or any claims made against Plaintiffs and to observe any trials to protect Plaintiffs from discrimination, harassment, coercing, and terrorization.
19. Order low cost or free federal attorney to assist Plaintiffs in their struggle for justice and achieving their freedom, and all their rights under the constitution laws and the federal government. Or, order federal fund to allow Plaintiff to hire a law firm with experience in federal litigation and in particular in the area of crimes, discrimination, harassment, and terrorizing citizen.
20. Order FBI investigation of the current public corruption that undermined the civil, constitutional, legal, and human rights of Plaintiffs. The system clearly targets males with patriotic characters like Lt. Kirk and P3 (especially military personnel and their supporting personnel), review the famous case (Child Abuse from the Bench) published in 2012. PD23 clearly admitted in the court records that she did not have any legal, constitutional, civil rights, or human rights in her court.
21. Order defendants to return all Plaintiff P3's business related devices and equipment.
22. Order search warrant for all places of the Gouda family to look for the business equipment and in particular the Computer Server.
23. Provide safe entry for P3 to his buildings and his business without any fear of malicious, hostile claims, or harassments. The local judicial system and prosecuting office process any complaints submitted by D6, her family and her attorney D16, and D17 at the speed of light, in absence of any evidence of wrongdoing, and just based on the mere feelings or delusions of D6 and D3. And on the other hand, they refuse to prosecute D6 and her family in the presence of material evidence of crimes even those committed against the government.
24. Enforce the federal law pertaining to incarceration of a free citizen without offering him adequate due process and compensate P3 financially as deemed appropriate by the jury for having a physician in good standing incarcerated for three days (the magnitude of the defamation) because of malicious prosecution by the Gouda family, with the support of other local culprits and private and public entities as listed in the defendant list.
25. Refer the criminals of welfare and IRS fraud to the appropriate federal agents. The welfare fraud is clearly evident and the amount of public abuse of money is in the term of hundreds of thousands of dollars but there is clear reluctance of the local judicial system to do their job and prosecute D3 & D4.
26. Refer any evidence of public corruption to Federal Bureau of Investigation (FBI) to protect Plaintiffs from further damages, allow P3 to conduct his own businesses without further harassment and discrimination.
27. Order full protection and full financial compensations to all Plaintiffs under the federal whistleblowing laws and under the Racketeering (RICO) ACT.

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28. Order FBI investigation of the link between the medical establishment UHS and UHC and the ongoing total destruction of Plaintiffs in the light of prior life and kidnapping threats P3 received when the medical establishment was defendants in claims of corruption, dialysis monopoly, and Patient Safety Violations of 2004 in Marion County circuit court. Although, P3 settled the case and started selling his businesses and his fixed assets, apparently the medical establishment breached the settlement agreement and went after him through destroying his family. The role of the tax preparatory in educating D6 and her family of how to embezzle, launder money, shelter money, commit tax and welfare frauds, etc., and he went out of his way risking his professional license and facing the wrath of the IRS is interesting to say the least especially when his wife was struggling to find a residency program to be a physician.
29. Aiming for a recovery of \$5-7 million dollars in compensations for all above damages paid by all defendants and entities is a reasonable compensation for business and personal damages.
30. All other relieves that deemed appropriate by the court and the jury.

Respectfully yours

X

DocuSigned by:  
*Nabil Guirguis*  
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Nabil Guirguis

Pro Se

12/28/2015